

**Public Comments and EPD Responses on Draft NPDES Permit  
Pinova Inc. – Permit No. GA0003735**

COMMENT RECEIVED	EPD RESPONSE
<p>There are not many vendors in our area that offer Enterococci sampling, [Pinova] currently has only one vendor that analyzes our Enterococci samples. The 6 hour hold time requirement for Enterococci samples precludes us from shipping samples overnight to another lab. Given these circumstances, we are currently unable to meet the once per week sampling requirement in the draft permit, as we do not yet have a lab that can analyze the samples. Is it possible to change the Enterococci sampling requirement to twice per month?</p>	<p>The federal regulations at 40 CFR 136, state the maximum hold time for Enterococci is 8 hours, which generally does preclude shipping the sample overnight. After the close of the public comment period, the permittee has provided information that they have secured a temporary location on Jekyll Island to comply with the permit limits. EPD appreciates the facilities commitment to comply with the permit conditions and requirements.</p>
<p>We are quite concerned about any polluted water being discharged in or our waterways. As well as the discharge in the air from this company. Our hope is that Georgia DNR-EPD will keep very strict guidelines on this company to ensure no tainted wastewater is dumped into our waterways. If we could be assured that every effective filtration system known be used and inspected and reported to EPD on a daily/weekly/monthly/annually to prove the filtration systems in place are accurately and effectively working seems like a responsible approach to monitoring this discharge.</p>	<p>This permit modification is to modify the compliance sampling point for Enterococci from external outfall no. 001 to internal outfall no. 002. Additional information regarding the permitting action can be found in section 4.4 of the proposed permit fact sheet.</p> <p>The remaining effluent limits and sampling frequencies have been retained from current permit issued in 2017. The facility's emissions are permitted by the EPD's Air Protection Branch under air quality permit no. 2861-137-0002-V-06-01.</p>